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November 22, 2013

Via ECF and Hand Delivery

Honorable Michael A. Hammer, U.S.M.J.
United States District Court,
District of New Jersey
Martin Luther King, Jr. Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *Aleynikov v. The Goldman Sachs Group, Inc.*
Civil Action no. 12 Civ. 5994 (KM) (MAH)

Dear Judge Hammer:

This firm represents defendant The Goldman Sachs Group, Inc. and counterclaimant Goldman, Sachs & Co. (the "firm") in the above-captioned matter. Pursuant to Your Honor's October 29, 2013 Order (ECF No. 190), and consistent with our October 21, 2013 letter to Your Honor (ECF No. 173) the firm respectfully re-files its September 30, 2013 motion to seal, modifying the relief sought only to withdraw redaction requests as to Lloyd Blankfien. Enclosed please find courtesy copies of the following documents which have been electronically filed with the Clerk today:

1. Notice of Motion to Seal;
2. Declaration of A. Ross Pearlson;
3. Proposed Order to Seal.

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Goldman Sachs' legal arguments are identical to those set forth in its September 30, 2013 memorandum of law in support of September 30, 2013 motion to seal (ECF No. 167-1), which are incorporated herein by reference. For Your Honor's convenience, a copy of that memorandum of law is also enclosed.

The exhibits attached to the Declaration of A. Ross Pearlson are the subject of the within motion to seal. Pursuant to Local Rule 5.3, the exhibits are also enclosed in unredacted form under seal.

We thank Your Honor for your attention to this matter.

Respectfully submitted,

s/ A. Ross Pearlson

A. Ross Pearlson

Enclosures

cc. Kevin H. Marino, Esq. (via ECF)